

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHN DOE,

Plaintiff,

v.

AMHERST COLLEGE, CAROLYN
MARTIN, JAMES LARIMORE, TORIN
MOORE, SUSIE MITTON SHANNON,
and LAURIE FRANKL,

Defendant.

No. 16-MC-00128-RSL

NON-PARTY SANDRA JONES'
UNOPPOSED MOTION FOR LEAVE TO
SEAL EXHIBIT 2 TO HER MOTION TO
QUASH SUBPOENA OR IN THE
ALTERNATIVE MOTION FOR A
PROTECTIVE ORDER

NOTE ON MOTION CALENDAR:
August 12, 2016

Non-Party, Sandra Jones, hereby moves for leave to designate under seal Exhibit 2 to Non-Party Sandra Jones' Motion to Quash Subpoena or in the Alternative Motion for a Protective Order.

CONFERRAL

Pursuant to LCR 5(g), counsel for Ms. Jones has conferred with counsel for both parties who do not oppose the relief requested in this Motion.

MOTION

In support of her Motion, Ms. Jones states that Exhibit 2 to her Motion to Quash Subpoena or in the Alternative Motion for a Protective Order constitutes an un-redacted version of the subpoena *duces tecum* that was served on Ms. Jones by Defendant John Doe in the lawsuit, *John Doe v. Amherst College et. al*, No. 3:15-cv-20097-MAP, in the United States District Court for the District of Massachusetts. This exhibit contains private information designated as confidential in those proceedings. Specifically, the Confidentiality Agreement stipulated to by the parties provides that,

The parties shall continue to use “John Doe” and “Sandra Jones” for the Plaintiff and disciplinary complainant respectively, in all pleadings and exhibits filed with the Court unless and until the Court modifies its Order allowing Plaintiff’s motion to proceed under a pseudonym.
Ex. 1 at 6, Para. 2

Exhibit 2 currently contains the disciplinary complainant’s proper name and does not use the pseudonym required by the Confidentiality Agreement. Accordingly, Non-Party Sandra Jones respectfully requests an order sealing the erroneous filing. Ms. Jones has attached a redacted version of Exhibit 2 (Pgs 1, 4) redacting only her proper name that may be filed as part of the public record.

DATED this 1st day of August, 2016.

s/John Clune (Pro Hac Vice Pending)
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s/Kathryn Goater

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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2016, I electronically filed the foregoing Motion (with attached exhibits and proposed order) with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Counsel for Amherst College, Carolyn Martin, James Larimore, Torin Moore, Susie Mitton Shannon and Laurie Frankl

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